

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF NEW YORK

SUSAN B. LONG and	)	
TRAC REPORTS, INC.,	)	
	)	
Plaintiffs,	)	
	)	
v.	)	
	)	No. 5:23-cv-1564 (DNH/TWD)
U.S. IMMIGRATION AND CUSTOMS	)	
ENFORCEMENT and	)	
U.S. CUSTOMS AND BORDER	)	
PROTECTION,	)	
	)	
Defendants.	)	
_____	)	

**NOTICE OF CROSS-MOTION**

MOTION BY: Plaintiffs Susan B. Long and TRAC Reports, Inc.

SUPPORTING PAPERS:

- (1) Memorandum of Law
- (2) Declaration of Nicolas A. Sansone,  
with Exhibits A through J
- (3) Declaration of Susan B. Long,  
with Exhibits K through T

RELIEF SOUGHT: An order granting partial summary judgment in favor of Plaintiffs against Defendant U.S. Immigration and Customs Enforcement (ICE) and directing ICE to begin producing nonexempt records that are responsive to Plaintiffs' operative Freedom of Information Act request, which is docketed in this case at Docket Number 40-7.

PAPERS IN OPPOSITION: Pursuant to the scheduling order at Docket Number 36, the opposition shall be due December 3, 2024.

REPLY: Pursuant to the scheduling order at Docket Number 36, Plaintiffs have leave to file a reply, which shall be due December 30, 2024.

ORAL ARGUMENT: Due to the technical complexity of the factual issues in this case and the number of legal issues involved, Plaintiffs submit that oral argument would be appropriate.

Dated: November 8, 2024

Respectfully submitted,

/s/ Nicolas A. Sansone

Nicolas A. Sansone (admitted pro hac vice)

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